

110TH CONGRESS
1ST SESSION

S. 1273

To amend the Internal Revenue Code of 1986 to allow permanent look-through treatment of payments between related foreign corporations.

IN THE SENATE OF THE UNITED STATES

MAY 2, 2007

Mr. KYL introduced the following bill; which was read twice and referred to the Committee on Finance

A BILL

To amend the Internal Revenue Code of 1986 to allow permanent look-through treatment of payments between related foreign corporations.

1 *Be it enacted by the Senate and House of Representa-*
2 *tives of the United States of America in Congress assembled,*

3 **SECTION 1. PERMANENT LOOK-THROUGH TREATMENT OF**
4 **PAYMENTS BETWEEN RELATED CONTROLLED**
5 **FOREIGN CORPORATIONS UNDER THE FOR-**
6 **EIGN PERSONAL HOLDING COMPANY RULES.**

7 Section 954(c)(6)(B) of the Internal Revenue Code
8 of 1986 is amended by striking “and before January 1,
9 2009,”.